

EXHIBIT 15

aabadi@optonline.net

From: aa@neg.com
Sent: Friday, March 18, 2022 5:41 AM
To: 'Goldberg, Roy'
Cc: aabadi@optonline.net
Subject: RE: NMOK JOFVXV April 24, 2022 AARON ABADI

I guess you did not read what I wrote.

I'm not threatening and I'm not a serial litigant.

Many companies and people recently chose to deprive me of my civil rights. Should I not be entitled to my day in court.

You read what I wrote and you have been warned.

The actions you and your clients are taking are in clear violation of federal, state, and city laws. I will do what I am entitled to do.

I'm not scared of bigshot airline lawyers.

Good day!

Aaron Abadi

From: Goldberg, Roy <roy.goldberg@stinson.com>
Sent: Friday, March 18, 2022 5:12 AM
To: aa@neg.com
Subject: RE: NMOK JOFVXV April 24, 2022 AARON ABADI

Mr. Abadi,

I can assure you that I oppose unlawful discrimination in any form. And I am interested in helping my clients comply with the laws. You and your fellow Americans Against Mask Mandates (AAMM) coalition members have a lot of issues with the Federal Transportation Mask Mandate (FTMM) – I understand that – and there are regulations and policies of the federal government with which you disagree. That is your right.

But you do not have the right to threaten and pursue baseless claims. At least you should be advised that there will be a significant financial cost for doing so. Allow me to explain something to you. Your threats to sue my clients and me personally for your groundless legal allegations will have real world consequences. I realize you are a serial pro se plaintiff who has sued various entities and persons will likely continue to do so. But just so we are clear and there is no misunderstanding down the road, the conspiracy claims you make against the airlines, their employees and me personally under the Civil War era civil rights statutes – 42 U.S.C. 1985(3) and 1986 -- are baseless, and will subject you to having to pay the attorneys' fees incurred to respond to your baseless claims, pursuant to 42 U.S.C. 1988 (as well as Rule 11, FRCP). If you sue persons and entities under 42 U.S.C. 1985 and 1986 and lose and they

parties you sued are “prevailing parties,” the fee shifting provision in 42 U.S.C. 1988 requires the plaintiff to pay the defendants for their attorneys’ fees. This is a real thing. The airlines’ request for attorneys’ from another member of your coalition who also filed similar claims is now pending. See the opposition filed by the Airline Defendants in the WD Ky case filed by your fellow AAMM member Michael Faris, who may now have to pay the airlines’ legal bills because of the same legal theory that you have been threatening since at least last December. In addition, per the Farese case (also attached) you cannot sue a lawyer for civil conspiracy because he was representing his client, and you are now fully advised that if you ignore these authorities and pursue these claims anyway, there will be a financial consequence to you.

Ideally, you and the airlines can find a way to coexist and we all look forward to the day that the FTMM is no longer in place because of the science. But if you persist with your threats then that is also a situation with which we are more than prepared to deal, per the above.

Roy Goldberg
 STINSON LLP
 1775 Pennsylvania Avenue, N.W.
 Suite 800
 Washington, D.C. 20006
 (202) 728-3005
 Email: roy.goldberg@stinson.com

Roy Goldberg
 Partner
 STINSON LLP
 1775 Pennsylvania Avenue NW, Suite 800
 Washington, DC 20006-4605
 Direct: 202.728.3005 \ Mobile: 301.908.3268 \ [Bio](#)
 Assistant: WDC.LSSTeam@stinson.com \ 202.572.9910

STINSON.COM
From: aa@neg.com <aa@neg.com>
Sent: Thursday, March 17, 2022 10:56 PM
To: Goldberg, Roy <roy.goldberg@stinson.com>; 'SAC' <SAC@aa.com>
Cc: aabadi@optonline.net
Subject: RE: NMOK JOFVXV April 24, 2022 AARON ABADI

Please read the attached response.
 Thank you,

Aaron Abadi

From: Goldberg, Roy <roy.goldberg@stinson.com>
Sent: Friday, March 4, 2022 4:05 PM
To: aa@neg.com; 'SAC' <SAC@aa.com>

Cc: aabadi@optonline.net

Subject: RE: NMOK JOFVXV April 24, 2022 AARON ABADI

March 4, 2022

Re: NMOK JOFVXV April 24, 2022

Dear Mr. Abadi:

Thank you for copying me on your email to American Airlines, Inc. ("American") dated March 1, 2022 which seeks to have American remove requirements attached to a conditional exemption from the Federal Transportation Mask Mandate ("FTMM") for a trip you plan to take on American on April 24, 2022. Your email specifically objects to the requirement that you satisfy American's stated conditions of providing: (1) an updated letter written within 30 days of your flight to evidence the existence of your medical condition which causes a disability for which the mask exemption would apply; and (2) a negative COVID-19 test that is taken within 72 hours of your flight.

First, we can assure you that American takes very seriously its obligations under the Air Carrier Access Act and related laws and regulations pertaining to the rights of disabled passengers. There have been a lot of allegations that you and your colleagues in the online coalition group Americans Against Mask Mandates ("AAMM") have been making which simply are not accurate. The pandemic has been challenging for the entire nation and world, and we can agree that the rights of the disabled must be respected even in these difficult times. Although there are legitimate differences of opinion regarding the role of government in a given set of circumstances, the fact remains that American takes its legal obligations very seriously and rejects all of you prior and current allegations to the contrary.

With regard to your March 1 request, please be reminded that both of the above-referenced conditions to your flying on American Airlines without a mask are fully authorized by the United States Department of Transportation ("DOT"). Specifically, the DOT "Notice of Enforcement Policy: Accommodation by Carriers of Persons with Disabilities who are Unable to Wear or Safely Wear Masks while on Commercial Aircraft" (Feb. 5, 2021) (the "DOT Enforcement Notice"), states as follows:

"To ensure that only qualified persons under the exemptions would be able to travel without a mask, the CDC Order permits operators of transportation conveyances, such as airlines, to impose requirements, or conditions for carriage, on persons requesting an exemption, **including requiring a person seeking an exemption to request an accommodation in advance, submit to medical consultation by a third party, provide medical documentation by a licensed medical provider, and/or provide other information as determined by the operator.** The CDC Order also permits operators to require protective measures, **such as a negative result from a SARS-CoV-2 viral test or documentation of recovery from COVID-19 or seating or otherwise situating the individual in a less crowded section of the conveyance, e.g., aircraft.**"

DOT Enforcement Notice, at 3 (citing "Order Under Section 361 of the Public Health Service Act (42 U.S.C. 264) and 42 Code of Federal Regulations 70.2, 71.31(b), 71.32(b): Requirement for Persons to Wear Masks While on Conveyances and at Transportation Hubs" (Jan. 29, 2021) ("CDC Order"), at 4)) (emphasis added). See also DOT Enforcement Notice, at 6 ("The CDC Order permits airlines to impose requirements or conditions for carriage on a person requesting an exemption, including requiring a person seeking an exemption to request an accommodation in advance, submit to medical consultation by a third party, **provide medical documentation**

by a licensed medical provider, and/or provide other information as determined by the airline"); and at 6-7 ("In addition, airlines may impose protective measures to reduce or prevent the risk to other passengers. For example, airlines may require protective measures, such as a negative result from a SARS-CoV-2 test, taken at the passenger's own expense, during the days immediately prior to the scheduled flight") (emphasis added).

American Airlines did not write this language. Rather, it is express guidance from the DOT, which regulated American's activities as a certificated commercial air carrier.

In light of the fact that the DOT Enforcement Notice expressly authorizes American to require adequate medical documentation of your condition, and a negative COVID-19 test, your demand to be excused from these requirements is frankly without legal basis. You clearly want to challenge the DOT Enforcement Notice – but that is between you and DOT. American is fully authorized to follow the express guidance and directives of its regulatory body, the DOT.

If you want to be exempt from the FTMM's requirement to wear a mask during your April 24, 2022 flight, please be sure to comply with the exemption conditions prior to your flight. If you want the benefit of the mask exemption but refuse to comply with the applicable conditions, that is your decision.

Finally, the reference in the February 22, 2022 email to American which is linked to your March 1 email has a statement that is not accurate. You stated therein that you will ask a federal court to grant an "emergency motion for injunction" and that the court will "grant my motion and/or demand that you allow me to fly just as recently happened in the case against American Airlines by Seklecki in the federal court in Boston, MA." We are pleased to provide you with the two transcripts from the February 11 and 16, 2022 hearings in the Michael Seklecki v. CDC et al. case. After you review the transcripts you will see that there was no such court ruling.

We hope you have a good weekend.

Roy Goldberg

Partner

STINSON LLP
1775 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006-4605
Direct: 202.728.3005 \ Mobile: 301.908.3268 \ [Bio](#)

Assistant: WDC.LSSTeam@stinson.com \ 202.572.9910

[STINSON.COM](#)

This communication (including any attachments) is from a law firm and may contain confidential and/or privileged information. If it has been sent to you in error, please contact the sender for instructions concerning return or destruction, and do not use or disclose the contents to others.

From: aa@neg.com <aa@neg.com>
Sent: Tuesday, March 1, 2022 11:33 PM
To: 'SAC' <SAC@aa.com>
Cc: aabadi@optonline.net; Goldberg, Roy <roy.goldberg@stinson.com>
Subject: RE: NMOK JOFVXV April 24, 2022 AARON ABADI

External Email – Use Caution

Dear American Airlines;

I received a call from your disability office saying that I will be able to travel on this trip, based on the disability information that I sent you. I do appreciate that. For over a year you refused to allow me to fly at all, since because of my disability, I cannot wear a mask. Now, finally, you will allow me to travel without a mask. That's great. We are getting places.

The problem is that you added two requirements that are clearly still in violation of the disability laws of the Air Carrier Access Act ("ACAA"), a violation of my human rights, and discrimination against me due to my disability.

1. You required me to send an updated letter that is dated within thirty days of the flight, even though I made you aware that sensory processing disorder in an adult is a permanent condition. You can google it, or ask your medical professionals. There is no need for reissuing the letter. Requiring unnecessary things is a violation of ACAA laws.
2. You required me to bring a Covid negative test. All the other passengers are not required. By asking me to do that, you are in violation of the ACAA laws again.

As an airline, you must know the ACAA laws well. I suggest that you speak to an attorney. I took the liberty to copy the attorney for American Airlines, Roy Goldberg. I assume that you are being advised by your attorneys that this discrimination of the disabled is okay. It absolutely is not. I will file a lawsuit, if necessary.

I recommend you speak to your attorney, whether it is Roy Goldberg, or someone else. Please understand that if your company tells you to discriminate and you actually listen and discriminate, your company is liable, and you can be personally liable too. There are both civil and criminal violations with relation to disability discrimination, and depriving people of their civil rights.

Please confirm that I can fly on the date of my tickets and that I will not have any of the unnecessary requirements. Confirm that I will not need a new letter and I will not need a covid test, unless I have symptoms, just like everyone else who do not have disabilities.

I look forward to your quick response.

Aaron Abadi

From: aa@neg.com <aa@neg.com>
Sent: Tuesday, February 22, 2022 4:06 PM
To: 'SAC' <SAC@aa.com>
Cc: 'aabadi@optonline.net' <aabadi@optonline.net>
Subject: NMOK JOFVXV April 24, 2022 AARON ABADI

Dear American Airlines;

As your disability department requested (below), I am giving you significant advance notice about this flight.

I HAVE AMEDICAL DISABILITY AND I CANNOT WEAR A MASK.

I AM GOING TO NEED YOU TO MAKE WHATEVER ARRANGEMENTS NECESSARY TO GET ME ON THIS FLIGHT WITHOUT A MASK.

I ALREADY HAD COVID AND I DO NOT POSE A DIRECT THREAT TO ANYONE.

I have attached a letter from my doctor clarifying that I cannot and should not wear a mask. I also attached a copy of my medical chart from NYU Langone Hospital, noting my sensory integration disorder.

I expect you to approve my mask exemption request immediately without violating the Air Carrier Access Act.

I should not be required to provide a negative PCR test, unless all the other passengers are required, as per ACAA law.

In the past, American Airlines violated those laws and denied me access to fly.

I will be on vacation/holiday with family and if I cannot board your flight back, I will be stranded at the airport in Phoenix, Arizona, thousands of miles from my home.

I assume that you have attorneys that represent you and advise you. I advise you to speak to your attorneys.

I will not be required to have a new or different letter written by my doctor. The attached letter is more than sufficient.

Disability discrimination is against the law. There are federal laws and state laws, both criminal and civil that you would be violating if you continue to discriminate.

There have been some silly airline personnel that tried to suggest that the DOT, CDC, or TSA can override actual laws written by Congress. That is preposterous.

Please be aware that if your company, and/or your attorney violates the law through you, or encourages you to violate the law, you are still personally responsible. If you deny me access in violation of the law, I will likely be suing you personally in addition to your employer, and attorneys that have been advising.

I will explain my specific disability to you as follows:

In clarifying the definition of disability, 28 CFR § 36.105 (1) says

“Physical or mental impairment means: (i) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as: Neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine.”

My disorder affects the body system related to the sense of touch, specifically, and is included in the above definition of disability. Touch is the ability to sense pressure, vibration, temperature, pain, and other tactile stimuli.

These types of stimuli are detected by mechanoreceptors, thermoreceptors, and nociceptors all over the body, most noticeably in the skin.

These receptors are especially concentrated on the tongue, lips, face, palms of the hands, and soles of the feet.

The law recognizes that a disorder in the important sense of touch severely limits many major life activities.

I HAVE SENSORY INTEGRATION DISORDER AKA SENSORY PROCESSING DISORDER
I CANNOT WEAR A MASK, OR GLASSES, OR ANYTHING ON MY FACE.
THIS IS A PERMANENT CONDITION.
THIS IS NOT JUST A DISCOMFORT.

Here are some of the relevant ACAA Laws that all airlines are bound by:

The ACAA laws (from 382.17 to 382.35) describe the following actions as discrimination.

- a. 382.17 “May carriers limit the number of passengers with a disability on a flight? As a carrier, you must not limit the number of passengers with a disability who travel on a flight.”
- b. 382.19 “May carriers refuse to provide transportation on the basis of disability? As a carrier, you must not refuse to provide transportation to a passenger with a disability... except... You may refuse to provide transportation to any passenger on the basis of safety, as provided in 49 U.S.C. 44902. The 49 U.S.C. 44902 refers to safety issues such as someone who doesn’t consent to a TSA search of themselves or their items. They mention another scenario, which also refers to the safety of the flight. Neither refers to wearing a mask. It then says you can refuse a passenger who poses a “direct threat,” which is established law that requires a significant risk, which also won’t apply in a case where there are no symptoms, and especially a person who has natural immunity.
- c. 382.21 “May carriers limit access to transportation on the basis that a passenger has a communicable disease or other medical condition?” You cannot, unless, again, the person is determined to pose a direct threat.
- d. 382.23 “May carriers require a passenger with a disability to provide a medical certificate?” Essentially, you cannot require a medical certificate unless the “medical condition is such that there is reasonable doubt that the individual can complete the flight safely, without requiring extraordinary medical assistance during the flight.” Also, if there’s a direct threat of a communicable disease.
- e. 382.25 “May a carrier require a passenger with a disability to provide advance notice that he or she is traveling on a flight?” No, except in special circumstances.
- f. 382.33 ‘May carriers impose other restrictions on passengers with a disability that they do not impose on other passengers?’ No, except in special circumstances.

I am asking for a simple letter or email confirming that on April 24, 2022, when I arrive at the Phoenix airport terminal, I will be allowed to check in and fly on your flights without any hinderance, and without any violation of the law, and that I will not be required to wear a mask.

Please be careful with your response, as it most likely will be filed in a lawsuit against your company, and others.

If I am denied, I will certainly file an emergency motion for injunction with the federal court, and I expect the court to grant my motion and/or demand that you allow me to fly, just as recently happened in the case against American Airlines by Seklecki in the federal court in Boston, MA.

I expect a response within 48 hours.

Thank you,

Aaron Abadi

516-639-4100

From: SAC <SAC@aa.com>
Sent: Sunday, February 20, 2022 2:40 PM
To: 'aa@neg.com' <aa@neg.com>
Subject: FW: American Airlines Mask Exemption Requirements

Hello,

American provides limited exemptions from the federal mask mandate for customers with a disability who cannot wear a mask, or cannot safely wear a mask, because of their disability as defined by the Americans with Disabilities Act (ADA). In order to receive consideration for an exemption, an official, dated letter from a licensed medical provider must be provided at least 24 hours prior to the scheduled departure of your flight and must contain the following elements:

- Official letterhead from the medical provider with their license number, contact information and date
- Customers name
- Attestation that the customer has a medically diagnosed physical or mental disability that qualifies under the Americans with Disabilities Act (42 USC 12101 et. seq) and because of that disability cannot wear or safely wear a mask for the duration of travel
- Description of why the customer is unable to wear or safely wear a mask for the duration of travel
- Signature of the licensed medical provider

Once completed, letters should be emailed as an attachment to SAC@aa.com with the subject containing the letters NMOK, the record locator of the customer, initial date of travel and customers name.

If your request is approved, it will be conditional upon validation of a negative COVID test (either PCR or Antigen) taken within 72 hours of departure – this must be presented upon check-in at the airport. Additionally, the approval is only valid on requested reservation.

Please keep in mind that these exceptions are very narrow in definition and includes a person with a disability who cannot wear a mask for reasons related to the disability. Your medical provider may be contacted for additional information. Additionally, AA may consult with a third-party medical provider regarding the letter.

Thank you,

Special Assistance Coordinator

1-800-237-7976

An advertisement for American Airlines. It features a black and white photograph of passengers in an airplane cabin, looking out the window at a landscape. To the right of the photo, the tagline "You are why we fly." is written in a bold, sans-serif font, with "Book on aa.com" in a smaller font below it.

You are why we fly.
Book on aa.com

American Airlines Special Assistance Coordinator



GINA S. | Special Assistance Desk – DFW SAC (SRO) |  | 800.237.7976